

1 CRAIG H. MISSAKIAN (CABN 125202)  
2 United States Attorney

3 MARTHA BOERSCH (CABN 126569)  
4 Chief, Criminal Division

5 MICHAEL J. MORSE (CABN 291763)  
6 JUAN M. RODRIGUEZ (CABN 313284)  
Special Assistant United States Attorneys

7 450 Golden Gate Avenue, Box 36055  
8 San Francisco, California 94102-3495  
9 Telephone: (213) 894-7367/0304  
10 FAX: (213) 894-7631  
michael.morsel@usdoj.gov  
juan.rodriguez@usdoj.gov

11 Attorney for Petitioner United States of America

12 IN THE UNITED STATES DISTRICT COURT  
13  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15  
SAN FRANCISCO DIVISION

16 UNITED STATES,

17 Plaintiff,

18 v.

19 BABAK BROUMAND AND  
20 MALAMATENIA MAVROMATIS,

21 Defendants.  
22  
23

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE  
STATUS CONFERENCE/CHANGE OF  
PLEA FROM AUGUST 7, 2025 AT 1:30  
P.M., TO OCTOBER 23, 2025 at 1:30  
P.M. AND EXCLUDE TIME UNDER  
THE SPEEDY TRIAL ACT; AND  
[PROPOSED] ORDER**

24  
25 STIPULATION

26 The parties hereby stipulate that the currently set status conference/change of plea be  
27 continued from August 7, 2025, at 1:30 p.m. to October 23, 2025, at 1:30 p.m.  
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1           1. Defendant BABAK BROUMAND is in custody of the Bureau of Prisons in  
2 Alabama after being convicted at jury trial in the related case of *United States v. Broumand*, 20-  
3 224-RGK(A).

4           2. The government has produced over 60,000 pages of discovery to defendant  
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,  
6 mortgage broker, title company, and escrow company records, tax returns, and witness  
7 interview reports.  
8

9           3. On March 24, 2022, the government obtained a superseding indictment in this  
10 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in  
11 which she was charged with two counts of False Statements on a Loan Application in  
12 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's  
13 indictment, co-defendant BABAK BROUMAND had already been charged.  
14

15           4. The parties have reached an agreement on a proposed resolution for both  
16 defendant Broumand and defendant Mavromatis. The government will email the plea  
17 agreement to Chambers promptly after the filing of this stipulation. The government will be  
18 recommending diversion for defendant Mavromatis; Pretrial services has conducted an  
19 evaluation and concurs in the recommendation of diversion. Defendant Mavromatis will be  
20 agreeing to diversion pursuant to yet unfiled charging document—a First Superseding  
21 Information. The government needs additional time to file this charging document and  
22 schedule a hearing before a magistrate judge so defendant Mavromatis can be arraigned on  
23 the First Superseding Information. Accordingly, in addition to the reasons outline below, the  
24 government and defense counsel agree that time is excludable because of the Court's  
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26  
27  
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“consideration...of [the] proposed plea agreement to be entered into by the [parties].” 18 U.S.C. § 3161(h)(1)(G).

6. Therefore, the parties stipulate and agree that excluding time until October 23, 2025, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 7, 2025, through October 23, 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

7. Accordingly, the parties ask that the Court to continue the status conference/change of plea to October 23, 2025, since that is the date the parties are soonest available that provides sufficient time for the First Superseding Information to be filed and the arraignment to held, as referenced above.

8. The parties represent that they will not seek a further continuance of this date.

9. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: August 4, 2025

/s/ Juan M. Rodriguez  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

DATED: August 4, 2025

/s/ Steven F. Gruel  
STEVEN F. GRUEL  
Counsel for Defendant BROUMAND

DATED: August 4, 2025

/s/ Paul H. Nathan  
PAUL H. NATHAN  
Counsel for Defendant MAVROMATIS

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from August 7, 2025, at 1:30 p.m. to October 23, 2025, at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from August 7, 2025, through October 23, 2025, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from August 7, 2025, through October 23, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and with the consent of the parties,

IT IS HEREBY ORDERED that the time from August 7, 2025, to October 23, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(1)(G), (h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED:

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HONORABLE WILLIAM H. ORRICK  
United States District Court